

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PATRISHA AND STEVEN  
SILLAVAN, on behalf of their  
minor children, C.S., B.S., and L.S.,

Plaintiffs,

v.

STATE OF WASHINGTON,  
DEPARTMENT OF SOCIAL AND  
HEALTH SERVICES and  
KATHERINE GRAFF,

Defendants.

NO. 2:17-CV-01126 RAJ

STIPULATED JUDGMENT AND  
DISMISSAL AS TO DEFENDANT  
STATE OF WASHINGTON

Judgment Summary (RCW 4.64.030):

Judgment Creditor(s): C.S., B.S., and L.S.

Judgment Creditor(s)' Attorney(s): Julie Kays and Lincoln Beauregard  
Connelly Law Offices, 2301 North 30<sup>th</sup> Street,  
Tacoma, WA 98403

Judgment Debtor: State of Washington

Judgment Amount: \$3,000,000.00

Pre-Judgment Interest: \$ 0

Post-Judgment Interest: \$ 0

Taxable Costs and Attorney Fees: \$ 0

1        THIS MATTER having come on regularly before the undersigned judge of the  
2 above-entitled Court; and the Plaintiffs, Patrisha and Steven Sillavan, on behalf of their  
3 minor children, C.S., and L.S., and their adult child B.S., acting by and through Julie Kays  
4 and Lincoln Beauregard, and the Defendants, State of Washington, Katherine Graff, and its  
5 Department of Social and Health Services, acting by and through Robert W. Ferguson,  
6 Attorney General, Kerri Ann Jorgensen and Matt Janz, Assistant Attorneys General; and  
7 these parties having made a stipulation pursuant to RCW 4.92.150, without any admissions  
8 of liability, settling and compromising this action against the defendants and allowing for  
9 dismissal of this action with prejudice against the Defendant State of Washington, and with  
10 a separate dismissal with prejudice having been entered dismissing claims against the  
11 individual defendants , and it appearing to the Court, after a review of the files and records  
12 herein and statements of counsel in open court, that the total sum of Three Million and  
13 No/100 Dollars (\$3,000,000.00) payable to Connelly Law Offices in trust for Plaintiffs is a  
14 proper and just settlement to be paid by the Defendant, State of Washington, to these  
15 Plaintiffs; that, specifically, the settlement amount(s) for each respective Plaintiff shall be  
16 equal and distributed to Plaintiffs' attorneys in multiple payments, pursuant to their request;  
17 and the Court being fully advised, now, therefore,

18        IT IS HEREBY ORDERED That the Plaintiffs B.S., C.S., and L.S., shall have  
19 judgment against the Defendant State of Washington for the total sum of Three Million and  
20 No/100 Dollars (\$3,000,000.00). Reasonable attorney's fees and costs found by the court  
21 shall be deducted from these gross amounts. Additionally, any liens, subrogated interests,  
22 or outstanding medical bills of which Plaintiffs' counsel has actual or constructive notice  
23 prior to court approval of this settlement shall be resolved out of these gross amounts, and  
24 defendants shall have no liability for any such liens, interest, or bills.

25        IT IS FURTHER ORDERED, ADJUDGED AND DECREED that neither party  
26 shall recover against any other party their respective fees, costs, nor interest herein.

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED That, pursuant to the  
2 provisions of RCW 4.92.160, the Defendant, State of Washington, shall make the following  
3 payments totaling the sum of Three Million and No/100 Dollars (\$3,000,000.00) for the  
4 benefit of the Plaintiffs herein as follows:

5 (1) \$1,812,308.82 to the Connelly Law Offices for B.S. share and any liens for B.S.,  
6 total attorney's fees, SGAL fees, and total costs;

7 (2) \$\_\_TBD\_\_\_\_ to the Connelly Law Offices for liens related to C.S. and L.S.  
8 in an amount to be determined;

9 (3) \$\_\_TBD\_\_\_\_ to purchase an annuity for C.S., in an amount to be determined  
10 after the settlement of existing liens;

11 (4) \$\_\_TBD\_\_\_\_ to purchase an annuity for L.S. in an amount to be determined  
12 after the settlement of existing liens.

13  
14 The check set forth in (1) in the amount of \$ \$1,812,308.82 shall be cut and sent to  
15 Connelly Law Offices within 30 calendar days of the date of this order.

16 The checks set forth in (2), (3), and (4) shall be cut and issued to the appropriate  
17 recipients within 30 days of the issuance of a separate order of this Court.

18 The aforementioned payments will total Three Million and No/100 Dollars  
19 (\$3,000,000.00) and that upon receipt of proof of said sum the clerk thereof shall forthwith  
20 record this judgment as satisfied against the State of Washington.

21 DATED this 14th day of January, 2019.

22   
23 The Honorable Richard A. Jones  
24 United States District Judge  
25  
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